

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,)
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES)
FOR THE STATE OF OKLAHOMA,)

Plaintiff,)

vs.)

TYSON FOODS, INC., et al,)

Defendants.)

4:05-CV-00329-TCK-SAJ

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THE VIDEOTAPED DEPOSITION OF
RONALD MULLIKIN, produced as a witness on behalf
of the Plaintiff in the above styled and numbered
cause, taken on the 14th day of November, 2007, in
the City of Tulsa, County of Tulsa, State of
Oklahoma, before me, Lisa A. Steinmeyer, a Certified
Shorthand Reporter, duly certified under and by
virtue of the laws of the State of Oklahoma.

1 Q Since you left Peterson Farms, have you held
2 any other positions where you were an environmental
3 manager of any type?

4 A No.

5 Q The poultry water quality handbook that was 04:59PM
6 marked as Exhibit 6 to your deposition, you said
7 that you never have had -- you never have read this
8 thing all the way through; is that true?

9 A That's correct.

10 Q Are you aware that it's got a number of 05:00PM
11 technical articles within it?

12 A Yes, it does.

13 Q Do you know to what extent this science on
14 these issues has advanced since this thing was
15 published in 1998? 05:00PM

16 A I have no idea.

17 Q Sir, do you consider yourself qualified to
18 determine whether or not the studies and articles in
19 that handbook are technically correct?

20 A Based on what I have learned and been told and 05:00PM
21 the various opinions that I've heard, I would have
22 no more an opinion about whether or not I agreed
23 with them.

24 Q Okay, and, well, I was asking whether you're
25 qualified to state the technical -- whether they are 05:01PM